

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to:

Betru, et al. v. Islamic Republic of Iran, 18-CV-08297 (GBD)(SN)

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) ss.
COUNTY OF NEW YORK)

TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN
DISTRICT OF NEW YORK

I, Megan Wolfe Bennett, Esq., am an attorney duly admitted to practice law in the State of New York and before this Court and am a partner of the law firm Kreindler & Kreindler LLP, attorneys for the *Betru* Plaintiffs in the action above, being duly sworn deposes and says that:

1. The *Betru* Plaintiffs' Summons, Complaint, and Notice of Suit, and certified Farsi translations of each, filed in the above-captioned matter were served upon defendant the Islamic Republic of Iran (Iran), along with the Foreign Sovereign Immunities Act and a certified Farsi translation.

2. Iran is not amenable to service pursuant to 28 U.S.C. § 1608(a)(1) or (2) because no special arrangement for service exists between the plaintiff and Iran and because there is no applicable international convention on service of judicial documents upon Iran.

3. The *Betru* Plaintiffs attempted to serve Iran pursuant to 28 U.S.C. § 1608(a)(3) by mail. Iran rejected this attempt and, therefore, because service by mail could not be effected within thirty (30) days, plaintiffs proceeded to effect service by diplomatic channels pursuant to

§1608(a)(4) as described below. *See* Exhibit A hereto, a true and correct copy of the Clerk's Certificate of Mailing.

4. Service was then effectuated upon the Iranian Ministry of Foreign Affairs as transmitted by the Foreign Interests Section of the Embassy of Switzerland in Tehran on May 30, 2021, in accordance with the Foreign Sovereign Immunities Act, 28 U.S.C. § 1608, *et seq.* *See* Exhibit B hereto, true and correct copies of the materials transmitted by the Department of State to Iran.

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained herein is true and correct.

Dated: December 6, 2021



Megan W. Benett, Esq. (MB 1234)

Sworn to before me this
6th day of December, 2021



Notary Public

ARCADIO SERRANO
Notary Public, State of New York
No. 01SE6369362
Qualified in Westchester County
My Commission Expires January 8, 2022